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PLAN

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Attorneys for Plaintiff
PAMELA HINZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

PAMELA HINZ,

Plaintiff,

v.

HEWLETT-PACKARD COMPANY
DISABILITY PLAN,

Defendant.

Case No. CV 10-03633 LHK

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO REMOVE INCORRECTLY
FILED DOCUMENTS**

STIPULATION AND ~~[PROPOSED]~~ ORDER
TO REMOVE INCORRECTLY FILED
DOCUMENTS

CASE NO. CV 10-03633 LHK

1 Defendant Hewlett-Packard Company Disability Plan ("Defendant") and Plaintiff
 2 Pamela Hinz ("Plaintiff") (jointly "the Parties"), by and through their counsel of record, hereby
 3 agree and stipulate as follows:

4 WHEREAS, on March 10, 2011, Defendant electronically filed its Opposition to
 5 Plaintiff's Motion for Summary Adjudication of the Standard of Review ("Opposition") (Document
 6 No. 27 on the docket);

7 WHEREAS, in support of the Opposition, Defendant filed the declaration of Ms.
 8 Janet Curry (Document No. 28 on the docket), which referenced as Exhibit A a copy of the
 9 administrative record for Plaintiff's claim for benefits at issue in this litigation;

10 WHEREAS, documents contained in Exhibit A to Ms. Curry's declaration contained
 11 private information governed by Federal Rule of Civil Procedure 5.2(a), including Plaintiff's social
 12 security number and date of birth;

13 WHEREAS, on March 11, 2011 Plaintiff brought it to Defense counsel's attention
 14 that Exhibit A included private information by objecting to the inclusion of such private information;

15 WHEREAS, counsel for Defendant promptly contacted the ECF department for the
 16 United States District Court for the Northern District of California and requested that a "lock" be
 17 placed on Document 28 and the exhibits thereto to prevent public access;

18 WHEREAS, the Parties mutually desire to prevent public access to any of the private
 19 information that was contained in Exhibit A to Document No. 28;

20 WHEREAS, Defendant wishes to replace Exhibit A to Document No. 28 with a
 21 redacted version and remove the previously filed unredacted version; and

22 WHEREAS, Plaintiff does not oppose this request;

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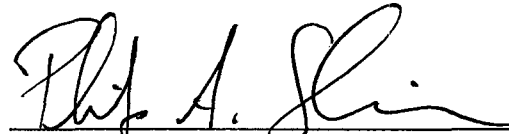
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1 THEREFORE, the Parties hereby stipulate and respectfully request that the Court
2 order the permanent removal of Document No. 28, including all exhibits thereto, from the Court's
3 file, to be replaced with a redacted version.

4 IT IS SO STIPULATED.

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6 Dated: March 15, 2011



PHILIP A. SIMPKINS
KIMBERLY J. GOST
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendant
HEWLETT-PACKARD COMPANY
DISABILITY PLAN

11 Dated: March 15, 2011



CHARLES B. PERKINS
FLYNN, ROSE & PERKINS
Attorney for Plaintiff
PAMELA HINZ

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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 15, 2011



THE HONORABLE LUCY H. KOH
United States District Court Judge